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November 8, 2017

The Honorable J. Paul Oetken  
United States District Court for the Southern  
District of New York  
40 Foley Square  
New York, NY 10007

Silvercreek Management Inc., *et al.* v. Citigroup, Inc., *et al.*,  
No. 02-cv-08881-JPO (S.D.N.Y.)

Dear Judge Oetken:

We write on behalf of the Financial Institution Defendants in this matter: Credit Suisse First Boston LLC (n/k/a Credit Suisse Securities (USA) LLC), Credit Suisse First Boston (USA), Inc. (n/k/a Credit Suisse (USA), Inc.) and Pershing LLC (“Credit Suisse”); Deutsche Bank Alex. Brown, Inc. (n/k/a Deutsche Bank Securities Inc.) and Deutsche Bank AG (“Deutsche Bank”); and Merrill Lynch & Co. (“Merrill Lynch”).

The Financial Institution Defendants will be filing their motions for summary judgment on November 10, 2017. We write to respectfully request permission to file under seal on November 10, 2017, our memoranda of law, rule 56.1 statements, and other associated documents (*e.g.*, declarations) and exhibits, and to then file redacted versions of the same materials on ECF by no later than November 17, 2017. Under this proposal, Plaintiffs and the Court will still receive full and unredacted versions of all materials on November 10, 2017, consistent with the current deadline in this case, and any necessary motions to seal, along with our proposed redacted versions, on November 17, 2017. Plaintiffs do not oppose this request.

Our submissions extensively quote or otherwise refer to material from the factual record in this case, much of which has been designated “Confidential” or “Highly Confidential.” We request additional time to file redacted versions of these materials so that we may review and redact them in a manner consistent with all applicable confidentiality orders.

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Due to the volume of exhibits, we request permission to send to Your Honor's Chambers the exhibits to our motions via secure file transfer protocol and our memoranda of law, rule 56.1 statements, and other associated documents via e-mail to OetkenNYSDChambers@nysd.uscourts.gov.

Respectfully submitted,

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